

# **Exhibit 24**

# **Washington Proposals**

**MDL 3047 – 2024-12-09 Agency Discovery JLB**  
**Washington – Meta Proposal**

**Search Terms:** Meta made its most recent counterproposal on December 8, 2024 to Department of Health, Office of Financial Management, Office of the Governor, Board of Education, Department of Commerce, Department of Social and Health Services, Department of Children, Youth, and Families and the Health Care Authority, and Board of Health.

<b>Social Media Terms</b>	
1	("Social media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR "screen time" OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR viber OR threema OR wechat OR kik OR textplus OR wickr OR YikYak OR "Yik Yak" OR finsta OR YT OR TT OR DM* OR "direct message") w/125 ("mental health" OR "behavioral health" OR "emotional health" OR "wellbeing" OR "well being" OR "well-being" OR "wellness" OR depress* OR anxiet* OR suicid* OR "self-harm" OR selfharm OR "self harm" OR addict* OR dependenc* OR habit* OR misuse OR bully* OR cyberbully* OR "body image" OR self-confidence OR "TMH" OR anx* OR anti-anxi* OR depress* OR antidepress* OR reclus* OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR therap* OR counsel* OR treatment*)
<b>Harm Terms</b>	
2	(teen* OR youth* OR young OR child* OR kid* OR tween* OR adolescen* OR minor* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR "gen-a*" OR student* OR pupil*) w/125 ("mental health" OR "behavioral health" OR "emotional health" OR "social health" OR "wellbeing" OR "well being" OR "well-being" OR depress* OR anxiety* OR suicid* OR self-harm OR addict* OR bully* OR cyberbully* OR "body image" OR self-confidence OR "TMH" OR OR anx* OR anti-anxi* OR depress* OR antidepress* OR reclus* OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia)
3	"Healthy Youth Survey"
4	"Project Aware"
5	("Social media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR "screen time" OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR viber OR threema OR wechat OR kik OR textplus OR wickr OR YikYak OR "Yik Yak" OR finsta OR YT OR TT OR DM* OR "direct message") w/125 ("mental health" OR "behavioral health" OR "emotional health" OR "wellbeing" OR "well being" OR "well-being" OR "wellness" OR depress* OR anxiet* OR suicid* OR "self-harm" OR selfharm OR "self harm" OR addict* OR dependenc* OR habit*

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	OR misuse OR bully* OR cyberbully* OR “body image” OR self-confidence OR “TMH” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR reclus* OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR therap* OR counsel* OR treatment*)
6	((“Social media” OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR “screen time” OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR viber OR threema OR wechat OR kik OR textplus OR wickr OR YikYak OR “Yik Yak” OR finsta OR YT OR TT OR DM* OR “direct message”) w/150 (teen* OR youth* OR young OR child* OR kid* OR tween* OR adolescen* OR minor* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR “gen-a*” OR student* OR pupil*))
7	“Dual Diagnos*”
8	((“mental health” OR “behavioral health” OR “emotional health” OR “social health”) w/20 (diagnos* OR assess* OR intak* OR domain*)) w/20 (“Social Media” OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR “screen time”)
9	((“GAIN” OR “GAINS”) w/10 (instrument* OR tool* OR assess* OR screen* OR diagnos*)) OR “GAIN-I” OR “GAIN-Q” OR “GAIN-SS”
10	((“mental health” OR “behavioral health” OR “emotional health” OR “social health”) w/20 medicat*) w/20 (“Social Media” OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime)
11	Counsel* w/10 ((“mental health” OR “behavioral health” OR “emotional health” OR “wellbeing” OR “well being” OR “well-being” OR “wellness” OR depress* OR anxiet* OR suicid* OR “self-harm” OR selfharm OR “self harm” OR addict* OR dependenc* OR habit* OR misuse OR addict* OR bully* OR cyberbully* OR “body image” OR self-confidence OR “TMH” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR therap* OR counsel* OR treatment*) w/20 (“Social Media” OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR “screen time”)
12	(“Mental Health Provider*” OR “Mental Health Service”) w/20 (“Social Media” OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime)
13	BRS OR “Behavioral Residential Service*”
14	(“Group Care” OR “Group Home” OR (“high needs” OR rehabilitat* OR intensive OR treatment OR hospital OR “mental health” OR “wraparound” OR “wrap-around”) w/10

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	(placement OR program*)) w/20 ("Social Media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR "screen time")
15	((need* OR service* OR "mental health") w/10 (teen* OR youth* OR young OR child* OR kid*)) w/20 ("Social Media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR "screen time")
16	((diagnos* OR assess*) w/20 (depression OR anxiet* OR ADHD OR ADD OR "Attention Deficit Hyperactivity Disorder" OR "Attention Deficit Disorder")) w/20 ("Social Media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR "screen time")
17	(Covid* OR coronavirus OR pandemic OR lockdown OR "lock* down" OR quarantine OR "social* distanc*" OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR "ecig" OR "e-cig" OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul) w/125 ("mental health" OR "behavioral health" OR "emotional health" OR "social health" OR "wellbeing" OR "well being" OR "well-being" OR depress* OR anxiety* OR suicid* OR self-harm OR addict* OR bully* OR cyberbully* OR "body image" OR self-confidence OR "TMH" OR anxi* OR anti-anxi* OR depress* OR antidepress* OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR scar* OR therap* OR counsel* OR treatment*) w/10 (teen* OR youth* OR young OR child* OR kid* OR tween* OR adolescen* OR minor* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13")
18	"ACE*" OR "adverse childhood experience" OR "adverse childhood experiences"

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**Custodians:** Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2024 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (\*) have been affirmatively proposed and agreed to by the Washington AG’s office during the course of the Parties’ negotiations. To the extent the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

The Washington Attorney General’s Office has not proposed custodians for the Washington Board of Health, nor has it produced information that is sufficient to allow Meta to identify a representative set of custodians that covers the relevant time period and subject matter for this agency. Accordingly, Meta requests that the Court require the Washington Board of Health to identify custodians that meet that criteria within three days of the Court’s order resolving this dispute. Meta reserves the right to request additional custodians in a meet and confer to be scheduled promptly after the agencies’ disclosure of an initial proposed custodian set.

<b>Custodian</b>	<b>Agency</b>	<b>Custodian</b>	<b>Agency</b>
Abell, Emily*	Department of Commerce	Chancellor, Jennifer*	Office of the Governor
Areiza, Ileana*	Department of Commerce	Gupta, Rashi*	Office of the Governor
Asphy, Nicole*	Department of Commerce	Leaders, Amber*	Office of the Governor
Colton-Suver, Annie*	Department of Commerce	Mineshita, Taku*	Office of the Governor
Danz, Karen*	Department of Commerce	Thompson, Maddy*	Office of the Governor
Davis, Matt*	Department of Commerce	Bulger, Ace*	Health Care Authority
Fall, Isaac*	Department of Commerce	Claycamp, Teresa*	Health Care Authority

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<b>Custodian</b>	<b>Agency</b>	<b>Custodian</b>	<b>Agency</b>
Feeley, Erin*	Department of Commerce	Cockrell, Diana*	Health Care Authority
Franco, Brianna*	Department of Commerce	Kirschbaum, Teesha*	Health Care Authority
Hanson, Christopher*	Department of Commerce	Mariani, Sarah*	Health Care Authority
Hemphill, Johnathan*	Department of Commerce	Mbajah, Enos*	Health Care Authority
Mckee, Gaia*	Department of Commerce	Wohletz, Sonya*	Health Care Authority
Thompson, Gina*	Department of Commerce	Chapman-See, Katherine*	Office of Financial Management
Tonn, Chelsea*	Department of Commerce	Snell, Nona*	Office of Financial Management
Coil, Alice*	Department of Children, Youth, and Families and the Health Care Authority	Williams, Robyn*	Office of Financial Management
Green, Natalie*	Department of Children, Youth, and Families and the Health Care Authority	Bahl, Seema*	Board of Education
Heddin, Jenny*	Department of Children, Youth, and Families and the Health Care Authority	Bergeson, Mark*	Board of Education
Hunter, Ross*	Department of Children, Youth, and Families and the Health Care Authority	Bobyleva, Viktoria*	Board of Education
Ives, Tleena*	Department of Children, Youth, and Families and the	Carretero, Yazmin*	Board of Education

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<b>Custodian</b>	<b>Agency</b>	<b>Custodian</b>	<b>Agency</b>
	Health Care Authority		
Krutsinger, Allison*	Department of Children, Youth, and Families and the Health Care Authority	Kaltenfeldt, Colton*	Board of Education
Lindeblom, Erik*	Department of Children, Youth, and Families and the Health Care Authority	Matthews, Arielle*	Board of Education
Newkirk, Rene*	Department of Children, Youth, and Families and the Health Care Authority	Mulhausen, Nicole*	Board of Education
Ordway, Frank*	Department of Children, Youth, and Families and the Health Care Authority	Muller, Alissa*	Board of Education
Perez, Dorene*	Department of Children, Youth, and Families and the Health Care Authority	Parr, Andrew*	Board of Education
Reeves, Ruben*	Department of Children, Youth, and Families and the Health Care Authority	Ricks, Anna*	Board of Education
Rodriguez, Marcos*	Department of Children, Youth, and Families and the Health Care Authority	Schultz, J Lee*	Board of Education
Rose, Nicole*	Department of Children, Youth, and Families and the Health Care Authority	Spaulding, Randy*	Board of Education

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<b>Custodian</b>	<b>Agency</b>	<b>Custodian</b>	<b>Agency</b>
Upton, Felice*	Department of Children, Youth, and Families and the Health Care Authority	Verd, Jacki*	Board of Education
Veele, Sarah*	Department of Children, Youth, and Families and the Health Care Authority	Dewalt, Francesca*	Department of Social and Health Services
Williams, Jennifer*	Department of Children, Youth, and Families and the Health Care Authority	Knudson, Erik*	Department of Social and Health Services
Ybarra, Vickie*	Department of Children, Youth, and Families and the Health Care Authority	Lexcel, Franes*	Department of Social and Health Services
Amiya, Rachel M*	Department of Health	Logan, Erik*	Department of Social and Health Services
Bates, Alexis R*	Department of Health	Martinez, Denise*	Department of Social and Health Services
Gaynaliy, Vadim*	Department of Health	Shirley, Brian*	Department of Social and Health Services
Ghaffar, Rabecha*	Department of Health		
Jones, Remeka*	Department of Health		
Matheson, Jasmine S*	Department of Health		
Payne, Melanie M*	Department of Health		
Simckes, Maayan S*	Department of Health		



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<b>Custodian</b>	<b>Agency</b>	<b>Custodian</b>	<b>Agency</b>
Stone, Emma*	Department of Health		
White, Debbie*	Department of Health		

**WA State-Proposed Search Terms: 12/9/2024****Scope and Parameters**

Our search term proposal is subject to agency approval, ESI validation protocol, and includes some terms of art only appropriate for certain agencies. Further, in a 12/4 meet and confer, there was an understanding that search terms are not appropriate for email inboxes of individuals that share sensitive and protected client/patient information via email. For those individuals, search terms will be run on their non-email and non-client/patient files. Searches will date back to 2012 for Rule 45 agencies and 2015 for Rule 34 agencies.

**Proposed search terms – All agencies**

(teen\* OR youth\* OR young OR child\* OR kid\* OR tween\* OR adolescen\* OR minor\* OR underage\* OR "under-age" OR juvenile\* OR "pre-teen\*" OR preteen\* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen\* z" OR "gen-z" OR "gen\* alpha" OR "gen-a\*") w/20("mental health" OR "behavioral health" OR "emotional health" OR "social health" OR "wellbeing" OR "well being" OR "well-being" OR depress\* OR anxiety\* OR suicid\* OR self-harm OR addict\* OR bully\* OR cyberbully\* OR "body image" OR self-confidence OR "ACE\*" OR "adverse childhood experience" OR "adverse childhood experiences" OR anxi\* OR anti-anxi\* OR depress\* OR antidepress\* OR reclus\*)

("Social media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR "screen time" OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Reddit OR Tumblr OR finsta OR YT OR TT OR DM\* OR "direct message") w/20 ("mental health" OR "behavioral health" OR "emotional health" OR "wellbeing" OR "well being" OR "well-being" OR "wellness" OR depress\* OR anxiet\* OR suicid\* OR "self-harm" OR selfharm OR "self harm" OR addict\* OR dependenc\* OR habit\* OR misuse OR bully\* OR cyberbully\* OR "body image" OR self-confidence OR anxi\* OR anti-anxi\* OR depress\* OR antidepress\* OR sad\* OR reclus\* OR stress

((("Social media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR "screen time" OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Reddit OR Tumblr OR finsta OR YT OR TT OR DM\* OR "direct message") w/20 (teen\* OR youth\* OR young OR child\* OR kid\* OR tween\* OR adolescen\* OR minor\* OR underage\* OR "under-age" OR juvenile\* OR "pre-teen\*" OR preteen\* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen\* z" OR "gen-z" OR "gen\* alpha" OR "gen-a\*"))

((("mental health" OR "behavioral health" OR "emotional health" OR "social health") w/20 (diagnos\* OR assess\* OR intak\* OR domain\*)) w/20 ("Social Media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR "screen time"))

(Covid\* OR coronavirus OR pandemic OR lockdown OR "lock\* down" OR quarantine OR "social\* distanc\*" OR shoot\* OR shot OR threat\* OR gun\* OR pistol OR rifle OR firearm OR "ecig" OR "e-cig" OR cig\* OR smok\* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent\* OR opio\* OR opia\* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller\* OR narcotic\* OR drug\* OR alcohol\* OR Juul) w/10 ("mental health" OR "behavioral health" OR "emotional health" OR "social health" OR "wellbeing" OR "well being" OR

"well-being" OR depress* OR anxiety* OR suicid* OR self-harm OR addict* OR bully* OR cyberbully* OR "body image" OR self-confidence OR anxi* OR anti-anxi* OR depress* OR antidepress* w/10 (teen* OR youth* OR young OR child* OR kid* OR tween* OR adolescen* OR minor* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13")
Counsel* w/10 ("mental health" OR "behavioral health" OR "emotional health" OR "wellbeing" OR "well being" OR "well-being" OR "wellness" OR depress* OR anxiet* OR suicid* OR "self-harm" OR selfharm OR "self harm" OR addict* OR dependenc* OR habit* OR misuse OR addict* OR bully* OR cyberbully* OR "body image" OR self-confidence OR "ACE*" OR "adverse childhood experience" OR "adverse childhood experiences" OR anxi* OR anti-anxi* OR depress* OR antidepress* w/20 ("Social Media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR "screen time")
<b>Proposed search terms – Terms of art as identified by WA State agencies, applicable to the agency providing the term</b>
((("GAIN" OR "GAINS") w/10 (instrument* OR tool* OR assess* OR screen* OR diagnos*)) OR "GAIN-I" OR "GAIN-Q" OR "GAIN-SS" w/10 (teen* OR youth* OR young OR child* OR kid* OR tween* OR adolescen* OR minor* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13"))
("Mental Health Provider*" OR "Mental Health Service*") w/20 ("Social Media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime)
BRS OR "Behavioral Residential Service*" w/10 (teen* OR youth* OR young OR child* OR kid* OR tween* OR adolescen* OR minor* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13")
("Group Care" OR "Group Home" OR (("high needs" OR rehabilitat* OR intensive OR treatment OR hospital OR "mental health" OR "wraparound" OR "wrap-around") w/10 (placement OR program*)) w/20 ("Social Media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR "screen time")
((need* OR service* OR "mental health") w/10 (teen* OR youth* OR young OR child* OR kid*)) w/20 ("Social Media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR "screen time")
((diagnos* OR assess*) w/20 (depression OR anxiet* OR ADHD OR ADD OR "Attention Deficit Hyperactivity Disorder" OR "Attention Deficit Disorder")) w/20 ("Social Media" OR META OR Facebook OR Instagram OR Insta OR FB OR IG OR screentime OR "screen time")
"Healthy Youth Survey"
"Project Aware"

"Dual Diagnos\*" w/10 (teen\* OR youth\* OR young OR child\* OR kid\* OR tween\* OR adolescen\* OR minor\* OR underage\* OR "under-age" OR juvenile\* OR "pre-teen\*" OR preteen\* OR "U18" OR "under 18" OR "U13")

**Washington State**  
**META Matter: State Agencies' Custodians List (12/9/24)**

Name	Agency
Bell, Ashley	BOH
Davis, Michelle	BOH
Dinardo, Molly	BOH
Haag, Hannah	BOH
Huynh, Linhphung	BOH
Kamali, Andrew	BOH
Lang-Perez, Cait	BOH
Larson, Michelle	BOH
Abell, Emily	Commerce
Areiza, Ileana	Commerce
Asphy, Nicole	Commerce
Colton-Suver, Ann	Commerce
Danz, Karen	Commerce
Davis, Matt	Commerce
Fall, Isaac	Commerce
Feeley, Erin	Commerce
Foster, Timmie	Commerce
Franco, Brianna	Commerce
Fullerton, Jess	Commerce
Hanson, Christopher	Commerce
Harrison, Sarah	Commerce
Helfer, Amanda	Commerce
Hemphill, Johnathan	Commerce
Jones, Taye	Commerce
Mckee, Gaia	Commerce
Parrish, Ellie	Commerce
Parsley, Emily	Commerce
Price, Joseph	Commerce
Rodgers, Mackenzie	Commerce
Rogers, Paris	Commerce
Sanchez Ford, Amanda	Commerce
Sieler, Amanda	Commerce
Thompson, Gina	Commerce
Tonn, Chelsea	Commerce
Wolff, Leslie	Commerce
Wyrobek, Jamie	Commerce
Coil, Alice	DCYF
Green, Natalie	DCYF
Heddin, Jenny	DCYF
Hunter, Ross	DCYF
Ives, Tleena	DCYF
Krutsinger, Allison	DCYF

**Washington State**  
**META Matter: State Agencies' Custodians List (12/9/24)**

Name	Agency
Lindeblom, Erik	DCYF
Newkirk, Rene	DCYF
Ordway, Frank	DCYF
Perez, Dorene	DCYF
Reeves, Ruben	DCYF
Rodriguez, Marcos	DCYF
Rose, Nicole	DCYF
Upton, Felice	DCYF
Veele, Sarah	DCYF
Williams, Jennifer	DCYF
Ybarra, Vickie	DCYF
Amiya, Rachel M	DOH
Bates, Alexis R	DOH
Ferris, Amy	DOH
Gaynaliy, Vadim	DOH
Ghaffar, Rabeeha	DOH
Jones, Remeka	DOH
Matheson, Jasmine S	DOH
Payne, Melanie M	DOH
Perez, Elizabeth	DOH
Peterson, Kristin I	DOH
Santoyo, Amber	DOH
Simckes, Maayan S	DOH
Stone, Emma	DOH
White, Debbie	DOH
Dewalt, Francesca	DSHS
Knudson, Erik	DSHS
Lexcel, Frances	DSHS
Logan, Erik	DSHS
Martinez, Denise	DSHS
Shirley, Brian	DSHS
Chancellor, Jennifer	GOV
Colvin, Jeanne	GOV
Forester, Sydney	GOV
Gupta, Rashi	GOV
Leaders, Amber	GOV
Mineshita, Taku	GOV
Thompson, Maddy	GOV
Bulger, Ace	HCA
Claycamp, Teresa	HCA
Cockrell, Diana	HCA
Kirschbaum, Teesha	HCA

**Washington State**  
**META Matter: State Agencies' Custodians List (12/9/24)**

Name	Agency
Mariani, Sarah	HCA
Mbajah, Enos	HCA
Wohletz, Sonya	HCA
Chapman-See, Katherine	OFM
Snell, Nona	OFM
Williams, Robyn	OFM
Bahl, Seema	SBE
Bergeson, Mark	SBE
Bobyleva, Viktoria	SBE
Carretero, Yazmin	SBE
Kaltenfeldt, Colton	SBE
Matthews, Arielle	SBE
Mulhausen, Nicole	SBE
Muller, Alissa	SBE
Parr, Andrew	SBE
Ricks, Anna	SBE
Schultz, J Lee	SBE
Spaulding, Randy	SBE
Verd, Jacki	SBE

Custodian Count:

103

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; Meta Platforms Technologies, LLC,

MDL No. 3047

Case Nos. 4:23-cv-05448-YGR  
4:23-cv-05885-YGR  
4:24-cv-00805-YGR

Office of the Attorney General, State of Florida,  
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta Payments, Inc.

**DECLARATION OF  
ALEXANDRA KORY REGARDING  
UNDUE BURDENS OF STATE  
AGENCIES**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

State of Montana, *ex rel.* Austin Knudsen,  
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook Holdings, LLC, Facebook Operations, LLC, Meta Payments, Inc., Meta Platforms Technologies, LLC, Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION THIS  
DOCUMENT RELATES TO:

4:23-cv-05448, 4:23-cv-05885; 4:24-cv-00805.



1 I, Alexandra Kory, hereby declare and state as follows:

2 1. I am an Assistant Attorney General and lead counsel for the Consumer Protection  
3 Division of the Washington State Office of the Attorney General in this litigation.

4 2. On December 3, 2024, I sent an email to the lead attorneys for each Washington  
5 State agency that has been ordered to participate in discovery requesting a “short summary of  
6 any unique burden or challenge to [their] agency client in producing discovery for Meta.” Their  
7 responses are summarized below.

8 **Department of Commerce**

9 3. Technical limitations require 2 to 4 hours to upload each custodial email account.  
10 Uploading cannot be done remotely and must be done at Commerce headquarters. Staff who work  
11 remotely have had to alter work schedules to accommodate this, which has HR implications as to  
12 conditions of employment and conditions of collective bargaining agreements.

13 4. Due to staffing shortages, with limited availability of records staff and IT staff  
14 assistance, responding to discovery in this matter conflicts with other time-sensitive legal  
15 responsibilities of staff to respond to requests under the Public Records Act.

16 5. A fire in agency headquarters diverted staff and shut down staff access to building  
17 for two weeks. Uploading files could not be done remotely.

18 6. A Microsoft enterprise-wide technical issue prevented upload of custodial files for  
19 several days.

20 7. Pre-scheduled staff leave days delayed information regarding custodians prior to  
21 Thanksgiving and may occasion further delays during the winter holidays.

22 **State Board of Education**

23 8. The State Board of Education (SBE) has fewer than 15 staff, with no full-time  
24 discovery coordinator, risk manager, or similar position. SBE staff, in particular the Executive  
25 Director and Executive Assistant, must thus set aside the agency's core work to respond to Meta.

26 9. SBE relies on an outside agency for its information technology (IT) services,  
27 including electronic processes to search and gather SBE electronic records. This required external  
28 coordination creates additional delay.

1           10.     Using SBE's established protocols and available technology, it is currently taking  
2 several hours to upload each .pst file containing email for a single custodian. SBE presently  
3 estimates that it will take at least 80 hours to upload outstanding email files from one custodian  
4 alone to the discovery vendor.

5           11.     SBE is still working to obtain records from former employees that may have  
6 responsive records.

7           12.     The SBE employee managing SBE's production has significant conflicts with her  
8 professional duties between now and the end of December. These include required meetings,  
9 processing time-sensitive and detailed holiday travel paperwork for the department, her own  
10 scheduled medical appointments, her own scheduled vacation at the end of the month, processing  
11 public records requests that must be responded to within five days, and significant time  
12 commitments onboarding several new employees.

13       **Office of Financial Management**

14           13.     Between October and December each even-numbered year, OFM's budget division  
15 develops the Governor's biennial budget proposal to the legislature, which has a statutory due date  
16 of December 20.

17           14.     This is OFM's busiest time and producing the Governor's budget takes absolute  
18 priority over all other activities.

19           15.     Production of the new budget is particularly challenging this year due to the state's  
20 significant budget deficit.

21           16.     All of the staff likely to have responsive records are in OFM's budget division and  
22 have been heavily engaged in budget development since October, working nights and weekends  
23 since mid-November.

24           17.     All staff with primary responsibility for handling discovery responses for OFM are  
25 similarly engaged in budget development.

26           18.     Attempting to meet the tight Meta discovery deadlines during budget development  
27 is therefore extremely challenging and burdensome for the agency.  
28

**Department of Children, Youth, and Families**

19. DCYF's search has turned up a large number of records. Due to the likelihood of confidential information in DCYF emails those records need to be reviewed manually if DCYF wants to ensure that no confidential information is released.

20. Uploading files is a time-consuming process and renders the uploading computer unusable for other work during the upload.

21. There are staffing shortages due to upcoming vacations and a current hiring freeze imposed by the Governor.

22. The attorney responsible for coordinating DCYF's discovery in this matter is in mediations or case evaluations every day except for three until December 20, when he begins a scheduled vacation. Of the three remaining days, he is in a department conference for two. This schedule severely curtails his ability to participate in the discovery process.

23. DCYF's primary e-discovery expert has been out of the office, returning the week of December 9.

**Governor's Office**

24. Washington elected a new Governor in November, and the transition to the new administration in January 2025 poses a significant challenge. Although the public records director will continue in the next administration, many other key staff will be onboarding and taking over the discovery work for this matter.

25. Additionally, the Governor's office is archiving 12 years' worth of records for the outgoing Governor. Once items are archived, there will be an additional step to retrieve them.

26. Finally, the initial search took hours because the proposed terms were broad. And that was without the upload of any files. With broad search terms, the time to upload custodial files will also take a longer time.

**Department of Social and Health Services**

27. DSHS is the largest State agency in Washington, and provides a wide range of services to individuals and families across the State, including food, medical, and cash public assistance programs, as well as services for vulnerable adults, elderly care, and behavioral health

1 supports As a result, it generates vast amounts of records and data across this broad range of  
2 topics, requiring significant staff time spent searching for and producing responsive records.

3 28. Most records related to services provided by DSHS are confidential under state and  
4 federal law, including RCW Chapter 70.02 and HIPAA. Even with individual client files not being  
5 requested, all responsive records will still need to be reviewed prior to release to ensure  
6 confidentiality. For instance, if a particular report or study references client names or medical  
7 information, these would need to be reviewed and de-identified prior to release.

8 29. Initial discussions with Meta in early September raised the issue of providing  
9 responsive records in installments. Meta indicated no specific disagreement with this approach.  
10 Now, given the Court's timeline, production in installments appears improbable.

#### 11 **Department of Health**

12 30. The sheer quantity of records requested may lead to technical challenges within the  
13 agency's data-management system.

#### 14 **Board of Health**

15 31. Meta's requested search terms include many types of documents relating to a wide  
16 array of topics including (among others) COVID-19 and/or remote learning, use of drugs or  
17 alcohol, the opioid and fentanyl epidemic, poverty, homelessness, lack of health insurance, and/or  
18 food insecurity, family trauma or deaths, violence, including school violence, domestic violence,  
19 gun violence, gun control and/or mass shootings, bullying or verbal abuse apart from usage of  
20 Social Media Platforms, and political polarization.

21 32. Many of these topics may have been included in public comment to the Board over  
22 the last 13 years. In 2022, the Board convened an ad hoc Immunizations committee that reviewed  
23 the Covid 19 vaccine, and during that time the Board received over 40,000 public comments on  
24 this topic alone.

25 33. To respond to the discovery requests, the Board's plan would be to include the  
26 comments and recordings to these and other Board meetings, but they are currently understaffed  
27 in administrative support. Even with outside support in identifying relevant emails or files it will  
28 take significant time and staff resources to respond.

